

REMARKS

Claims 1-29 are pending in this application. Claims 6, 7, 12, 13, 17, and 25, have been amended to further define the invention. Applicant acknowledges the Examiner's indication of allowable subject matter within claims 7-10 and 13-15. No new matter has been entered through these amendments.

Rejections under 35 U.S.C. § 102

Applicant respectfully requests reconsideration of the rejection of claims 1-6, 10-12, 17-20, and 24-28 under 35 U.S.C. § 102 as being unpatentable over U.S. Patent Application No. 6,347,153 to Triplett et al. ("Triplett") in light of the amendments and arguments presented below.

The Examiner asserts that Triplett discloses all of the features of independent claim 1. Claim 1 includes the feature of distributing the image data to multiple branches, wherein at least two of the multiple branches include filters configured to blur the image data at different resolutions, and combining data output from the at least two of the multiple branches, among other features. These features are not disclosed or taught by Triplett. Claim 1 specifies that at least two filters are configured to blur the image data at different resolutions. Figure 2 and the corresponding text of columns 6, 10, 11, and 38-40 relied on by the Examiner, nowhere mention that there are at least two low pass filters to blur the image data. Furthermore, a single output is provided from module 32 of Figure 2. Claim 1 further specifies that the output from each of the two branches that blur the image data is combined. As Triplett fails to disclose two branches that blur the image data, e.g., through a low pass filter, it cannot be reasonably asserted that Triplett discloses combining data from two branches that blur the image data. The Examiner is respectfully referred to column 4, lines 1-9, where it is explained that mixer 41 combines a percentage of each different class of data, i.e., high frequency, low frequency and continuous tone classes. Triplett does not disclose combining similar classes of low frequency data processed at different resolutions as there is only one output of data from the low frequency halftone processing (see column 5, lines 3-11). Accordingly,

Applicant respectfully requests that the rejection of claim 1 be withdrawn for at least these reasons. Claims 2-5 depend from claim 1 and are not anticipated by Triplett for at least these reasons.

Claim 6 has been amended to include an allowable feature of claim 7. Accordingly, Applicant respectfully requests removal of the rejection of claim 6. Claims 10 and 11 depend from claim 6 and are not anticipated by Triplett for at least these reasons.

Similarly, claim 12 has been amended to include an allowable feature of claim 13. Accordingly, Applicant respectfully requests removal of the rejection of claim 12. Claim 16, which was not addressed by the Examiner, depends from claim 12 and is not anticipated by Triplett for at least these reasons.

Claim 17 has been amended to include the feature of logic for combining output of at least two of the multiple branches and subtracting the combined output from output of one of the at least two multiple branches. This feature is not disclosed or taught by Triplett. Triplett utilizes a fuzzy classification scheme that enables weighted coefficients to be assigned to image data exhibiting characteristics of multiple types of image categories. Triplett eliminates the need for the image categories to be assigned in a mutually exclusive manner. A classification vector is assigned to each area of the image data and a member value of the vector is associated with each pre-defined image category (see column 10, lines 50-65). Each pixel is associated with a member value (between 0 and 1) in three classes, which act similar to weighted coefficients (see column 12, line 56 through column 13, line 45, and column 15, line 59 through column 16, line 37). Claim 17, as amended, combines the image data detected at different resolutions (outside or within the same category) and then subtracts this result from the image data at one of the different resolutions. Nowhere does Triplett disclose this feature. Applicant respectfully requests removal of this rejection for at least the above stated reasons. Claims 18-20 and 24 depend from claim 17 and are not anticipated by Triplett for at least these reasons.

Claim 25 has been amended to include the feature of circuitry for combining at least two outputs of the multiple branches and subtracting the

combined output from output of one of the at least two multiple branches. This feature is not disclosed or taught by Triplett. For the reasons discussed above with regard to claim 17, Applicant respectfully requests removal of this rejection. Claims 26-28 depend from claim 25 and are not anticipated by Triplett for at least these reasons. Applicant further disagrees with the Examiner's characterization of Triplett with regard to claim 27. According to the Examiner the subtractors for implementing a triangular filter disclose circuitry for subtracting a result of the circuitry for adding from one of the at least two outputs as specified in claim 27. The subtractors referred to by the Examiner do not perform any functionality remotely similar to the circuitry for subtracting of claim 27. The functional limitations of the circuitry of claim 27 are acceptable and are not being considered by the Examiner. The unrelated reference in Triplett to subtractors does not anticipate the features of claim 27. Should the Examiner maintain this rejection, Applicant respectfully requests that the Examiner specify how the subtractors for the triangular filter of Triplett disclose circuitry for subtracting a result of the circuitry for adding from one of the at least two outputs.

Rejections under 35 U.S.C. § 103

Claims 21-23 and 29 were rejected under 35 U.S.C. § 103 as being unpatentable over Triplett in view of US Patent No. 4,288,821 to Lavallee et al (Lavallee). In light of the amendments to claims 30 and 35, the Applicant respectfully requests withdrawal of this rejection in light of the amendments and arguments contained herein.

Claims 21-23 depend from claim 17. As mentioned above, claim 17, as amended, includes the features of logic for combining output of at least two of the multiple branches and subtracting the combined output from output of one of the at least two multiple branches, among other features. Triplett fails to disclose or teach these features and Lavallee fails to cure the deficiencies of Triplett.

Claim 29 depends from claim 25. Claim 25, as amended, includes the feature of logic for combining output of at least two of the multiple branches and subtracting the combined output from output of one of the at least two multiple

branches. Triplett fails to disclose or teach these features and Lavallee fails to cure the deficiencies of Triplett.

Furthermore, Applicant respectfully submits that there is no motivation to combine the references as suggested by the Examiner. The embodiments described within Triplett are not conducive to screening operations (see column 19, lines 39-51). Triplett gets around this issue by replacing the screening operation with a linear operation (see column 19, lines 52-58). Accordingly, if the Examiner maintains this rejection, the Applicant respectfully requests that the Examiner elaborate as to why one skilled in the art would ignore this requirement of Triplett and how would the discrete nature of the descreening be adapted to be applied at the different levels of the fuzzy classification control of Triplett.

In view of the foregoing, Applicant respectfully submits that all of the pending claims are in condition for allowance. In the event a telephone conversation would expedite the prosecution of this application, the Examiner may reach the undersigned at (408) 952-6126. In view of the foregoing amendments and remarks, Applicant respectfully requests favorable reconsideration of the present application.

Respectfully submitted,



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